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BEFORE THE POSTAL REGULATORY COMMISSION WASHINGTON, D.C. 20268-0001

MODIFICATION OF MAIL CLASSIFICATION SCHEDULE REGARDING FIRST-CLASS MAIL SINGLE-PIECE RESIDUAL PRICE TABLE Docket No. MC2013-30

RESPONSE OF UNITED STATES POSTAL SERVICE TO COMMISSION'S INFORMATION REQUEST NO. 1 (January 29, 2013)

The Postal Service hereby files its responses to questions 1-4 of Commission's Information Request No. 1, issued on January 25, 2013. Each question is stated verbatim, and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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- **1.** Under the current rate schedule, mailers tender residual pieces from a First-Class presort letter mailing as Single-Piece First-Class Mail.
- a. Please describe the physical steps involved in preparing the residual pieces from a presort mailing for presentation to the Postal Service. In answering, describe any differences among mailings of mixed pieces and those containing only one-ounce or two-ounce presort pieces. b. Please provide a copy of the forms and/or mailing statements that mailers must submit to the Postal Service with a presort mailing, including any forms and/or mailing, statements that are required for residual pieces tendered. In answering, describe any differences among mailings of mixed pieces and those containing only one-ounce or two-ounce presort pieces.

RESPONSE:

(a) For mixed presort mailings, mailers would prepare the residual letters in trays that do not contain any presorted pieces, but present those trays along with the presorted mailing (if the 48-cent price is appropriate and desired). Mailers claiming the Residual price of \$0.48 for pieces up to and including 2 ounces, will prepare the 1 and 2 ounce residual pieces in the same tray, and use the same postage statement as the Presort pieces. Mailers are not expected to incur the cost of separating the residual one-ounce pieces from the two-ounce pieces. But if they do, the separate trays of one-ounce and two-ounce pieces must be entered with a separate postage statement, using retail single-piece prices. Retail prices also apply if a mixed-weight presort mailing is presented with only 2-ounce residual pieces.

Mailers have two options in preparing residual pieces from a pure 1-ounce mailing. Option 1 is to report the residual pieces on the same postage statement as the Presort mailing, and pay the residual price of \$0.48. Option 2 is to enter the residual pieces separately from the Presort mailing, report them on a separate postage statement, and pay the Retail Single-Piece price of \$0.46. In both options, all residual pieces are placed in trays separate from the Presort pieces.

Mailers have the same options for residual pieces from a pure 2-ounce mailing, but we expect that mailers will choose the 48-cent price, and report the residual pieces on the same postage statement as the Presort mailing.

(b) PS Form 3600 (see next seven pages) is used for all mailings. For the 48-cent price, the residual pieces are included on the same postage statement as the Presort pieces, using line B4. For retail prices (46 cents for one-ounce residuals, and 66 cents for two-ounce residuals), line B5 is used on a separate PS Form 3600 from the Presort pieces. For mixed-weight Presort mailings, line B4 is used unless the residual pieces are in separate trays by weight, in which case line B5 must be used on a separate postage statement.¹

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¹ Residual pieces that weigh over 2 ounces will always need to be placed in separate trays by weight. These heavier pieces will be recorded on line B5, but on the same postage statement as the Presort mailing.

United States Postal Service

Postage Statement—First-Class Mail and First-Class Package Service

Post Office: Note Mail Arrival Date & Time (Do Not Round-Stamp)

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)-E		older's Name and A dress, if Any	Address and	Telephone		Name and Addr Mailing Agent (I than permit hold	f other	ne		ess of Individual or Which Mailing is Prepared rmit holder)
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ng	Type of Permit Imprint Letters Postage Precanceled Stamps Flats Metered Parcel			No. of Pieces		of a Single Piece	Mailing ☐ Single Class	Total Pieces Customer Generated Electronic Labels DelCon SigCon		Sacks 1 ft. Letter Trays
Mailing	Permit #		For Mail End	□ closed Within Anot Mail ☐ Bound Print	ther Clas	SS			Total Weight	2 ft. Letter Trays
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ge		d Trip ONLY: One [DVD/CD or otl	her disk	1	Subtotal Postage (Add parts totals)				
Postage	Price at Which Postage Affixed (Check one). Complete if the mailing includes pieces bearing metered/PC Postage or precanceled stamps.							-		
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	Part A utomation Prices			C	Check box at left if	prices are populat	ed in this sectio
	cards ble for postcard price)	Price	No. of Pieces	Subtotal Postage	Discount Total	Fee Total	Total Postage
A1	5-Digit						
A2	3-Digit						
А3	AADC						
A4	Mixed AADC						
Lette	ers	Price	No. of Pieces	Subtotal Postage	Discount Total	Fee Total	Total Postage
A5	5-Digit						
A6	3-Digit						
A7	AADC						
A8	Mixed AADC						
Flats	3	Price	No. of Pieces	Subtotal Postage	Discount Total	Fee Total	Total Postage
A9	5-Digit						
A10	3-Digit						
A11	ADC						
A12	Mixed ADC						
A13					Part A Subtotal (A	dd lines A1-A12)	
Full	Service Intelligent Mail	Option					
A14	-		ostcards - Numbe	r of pieces that co	mply	x \$0.003 =	
A15			Letters - Number	r of pieces that co	mply	x \$0.003 =	
			Flats - Number	r of pieces that co	mply	x \$0.003 =	
416							

Firs	t-Class Mail						
	Part B onautomation Prices			Check b	oox at left if price	es are populate	d in this section.
	cards ble for postcard price)	Price	No. of Pieces	Subtotal Postage	Discount Total	Fee Total	Total Postage
B1	Presorted						
B2	Single-Piece						
Lette	rs	Price	No. of Pieces	Subtotal Postage	Discount Total	Fee Total	Total Postage
В3	Presorted						
B4	Residual Single-Piece From First-Class Mail Mailing (Up to and Including 2 oz.)						
B5	Single-Piece						
B6	Single-Piece From Standard Mail Mailing						
Nonr	nachinable Letters	Price	No. of Pieces	Subtotal Postage	Discount Total	Fee Total	Total Postage
B7	Presorted						
B8	Single-Piece						
B9	Single-Piece From Standard Mail Mailing						
B10	Nonmachinable Surcharge * (for presorted letters)						
B11	Nonmachinable Surcharge * (for single-piece letters)						
* Only	on FCM letters with one or more nonmachina	ble characteristics					
Flats		Price	No. of Pieces	Subtotal Postage	Discount Total	Fee Total	Total Postage
B12	Presorted						
B13	Single-Piece						
B14	Single-Piece From Standard Mail Mailing						
Parc	els	Price	No. of Pieces	Subtotal Postage	Discount Total	Fee Total	Total Postage
B15	Single-Piece/Does not meet content stds.						
Perm	nit Reply Mail	Price	No. of Pieces	Subtotal Postage	Discount Total	Fee Total	Total Postage
B16	Single-Piece Letter (1 oz. or less)			-			
B17	Single-Piece Letter (over 1 oz. to 3.5 oz.)						
B18	Single-Piece Flat (1 oz. or less)						
B19	Single-Piece Flat (over 1 oz. to 13 oz.)						
			Part B	Total (Add lines	s B1-B19)		

	Part C		Check box at left if prices are populated in this section.				
Com	mercial Base Parcels	Price	No. of Pieces	Subtotal Postage	Discount Total	Fee Total	Total Postage
C1	5-Digit						
C2	3-Digit						
СЗ	ADC						
C4	Single-Piece/Mixed ADC						
C5	Single Pc/From Std Mail Mailing						
C6	Parcel Surcharge						
	mercial Plus Parcels oz. or more but less than 16 oz.)	Price	No. of Pieces	Subtotal Postage	Discount Total	Fee Total	Total Postage
C7	5-Digit						
C8	3-Digit						
C9	ADC						
C10	Single-Piece/Mixed ADC						
C11	Parcel Surcharge						

Part C Total (Add lines C1-C11)	

Rou	ındtrip DVE	D, CD, or Otl	her Disc N	Mail				
F	Part D				Check bo	x at left if pric	es are populate	ed in this section.
F	Round Trip Mailings th	at Contain a DVD, CD,	or Other Disc					
Auto	mation Letters	Price	No. of Pieces	Subtotal Postage		count otal	Fee Total	Total Postage
D1	5-Digit							
D2	3-Digit							
D3	AADC							
D4	Mixed AADC							
Pres	ort Letters	Price	No. of Pieces	Subtotal Postage		ount	Fee Total	Total Postage
D5	Presorted							
D6	Single-Piece							
Auto	omation Flats	Price	No. of Pieces	Subtotal Postage		ount otal	Fee Total	Total Postage
D7	5-Digit							
D8	3-Digit							
D9	ADC							
D10	Mixed ADC							
Pres	ort Flats	Price	No. of Pieces	Subtotal Postage		count otal	Fee Total	Total Postage
D11	Presorted							
D12	Single-Piece							
Pern	nit Reply Mail	etter (1 oz. or less)	Price	No. of Pieces	Subtotal Postage	Discount Total	Fee Total	Total Postage
D14	Single-Piece Fla							
דוט	Olligie-Flece Fle	at (2 02. 01 le33)						
	1							T
D15					Part L	Subtotal (Ad	dd lines D1-D14	9
Full	Service Intelliger	nt Mail Option						
D16		-	Letters -	Number of pieces	s that comply		x \$0.003 =	=
D17			Flats - N	Number of pieces	that comply		x \$0.003 =	=
				<u>-</u>				
			Pa	rt D Total (Line	D15 minus D	16 or D17)		
Elec	ction Mail							
	Part E				Check b	ox at left if pri	ices are popular	ted in this section
	Automation Election M	lail Prices					7 - 7 - 1	
	er-size (not over 3	3 oz.)	Price	No. of Pieces	Subtotal Postage	Discount Total	Fee Total	Total Postage
E1	Letter-size							
E2						Part E S	ubtotal <i>(Line E1</i>)
Full	Service Intelliger	nt Mail Option						
E3			Letters -	Number of pieces	s that comply		x \$0.003 =	=
					Pa	rt E Total <i>(Lii</i>	ne E2 minus E3)

Part F Repositionable Notes	etes (RPN)		Check box at left if price	es are populated in this section
•	or RPN, it does not include postag	ge charges. If usi	ing RPNs, all pieces in mailing mu	st include RPNs.
	Price		No. of Pieces	Total Postage
F1 Repositionable Notes	Filce	No. of Pieces		Total Fostage
1 11 11 11 11 11 11		<u> </u>		
			Part F Total (Line F1)	
Extra Services and	d Fees			
□ Part S			Check box at left if price	es are populated in this section
Extra Services			·	• •
Items mailed with Extra Serv	rices must meet the mailing stand	lards for the extra Fee	a service. No. of Pieces	Total Postage
S1 Certificate of Mailing ((3 or more - Form 3877)	\$0.44		
S2 Certified Mail		3.10		
S3 Collect on Delivery (C	OD)			
S4 USPS Tracking/Delive	ery Confirmation*			
S5 Insurance				
S6 Registered Mail				
S7 Restricted Delivery		4.75		
S8 Return Receipt (Elect	ronic)	1.25		
S9 Return Receipt (Form	3811)	2.55		
S11 Signature Confirmation	n*			
S13 Special Handling				
S17 Picture Permit Imprint	**			
S18 Day Certain Delivery				
S19 Certificate of Bulk Mai	iling (Form 3606)			
* Available for parcels only	'		1	1
rivandore rer pareere erny				
** Available for postcards, letters a	and flats			

First-Class Mail - Instructions

Use this form for First-Class Mail and First-Class Package Service.

- Step 1: Complete Mailer and Mailing sections on page 1.
- **Step 2:** Before you complete the Postage section, go to parts A F and S. Complete the part(s) that pertain to your mailing.
- Part A: Automation prices: All pieces must be reported on the appropriate line at the full published price (not including the Full Service Intelligent Mail incentive). Pieces that comply with the Full Service Intelligent Mail option requirements are additionally reported on the lines provided. The following information will help you determine which parts to complete:
 - Part A: Automation prices Enter total in Part A Total box.
 - Part B: Nonautomation prices Enter total in Part B Total box.
 - Part C: Commercial Plus Parcels Enter total in Part C Total box.
 - Part D: Roundtrip DVD, CD, or other disc mailer Enter total in Part D Total box.
 - Part E: Election Mail Enter total in Part E Total box.
 - Part F: Repositionable Notes (RPN) Enter total in Part F Total box.
 - Part S: Extra Services Enter total in Part S Total box.
- **Step 3:** Add the postage in parts A through S without rounding.
- **Step 4:** Return to the Postage section on page 1. Check the boxes that correspond to the form parts used. Add the postage amounts for all parts and enter on Line 1 Subtotal Postage, rounded off to two decimal places.
- **Step 5:** Complete Line 2 for Postage Affixed mailings. Check the box for the Price at Which Postage Affixed (Correct, Lowest, or Neither). Multiply the number of pieces by the postage affixed put the total in the Postage Affixed block.
- **Step 6:** Lines 3 and 4 are for postage adjustments that apply to the entire mailing. Report any Incentive/Discount on Line 3 and any Fee on Line 4.
- **Step 7:** Calculate Line 5 Net Postage Due by subtracting any Postage Affixed and Incentive/Discount (Lines 2 and 3) from the Subtotal Postage (Line 1) and adding any Fee (Line 4). For permit imprint mailings, the Net Postage Due is the amount that will be withdrawn from the permit imprint account listed in the Permit # box in the Mailing section. For postage affixed mailings, the Net Postage Due is the amount that must be tendered in addition to that already affixed to the mail, and it may be tendered by any of the applicable methods including withdrawal from an advance deposit account that can be listed by Permit # on Line 5.
- **Step 8:** Read and sign the Certification section, including your telephone number. Attach all completed pages and submit with the mailing.

Information: For more information on mailing standards, prices, and fees please go to Postal Explorer at pe.usps.com.

- 2. In response to Chairman's Information Request No. 1, question 2b, the Postal Service explains that one-ounce residual pieces from pure one-ounce presort mailings can either be entered separately, for the single-piece 46-cent rate or presented with a pure one-ounce presort mailing for the 48-cent residual rate.
- a. Please describe the difference in physical preparation requirements to qualify for the 46-cent rate versus the 48-cent residual rate.
- b. Please describe the difference in forms and/or mailing statements that mailers must submit to the Postal Service to qualify for the 46-cent rate versus the 48-cent residual rate.
- c. Please describe the difference in physical preparation requirements and forms and/or mailing statements to qualify for the one-ounce rate between what they are currently and what they will be beginning January 27, 2013.

RESPONSE:

See the response to question 1. To receive the 46-cent price after January 27, the mailer must identify the residual pieces as "Retail" and use a separate postage statement, with 46 cents indicated on Line B4.

- **3.** As proposed in the MCS language provided in response to Chairman's Information Request No. 1, question 4, if residual letters presented with a mixed-weight presort mailing were purely two-ounce items, the Single-Piece Machinable Letter rate would apply.
- a. Please describe how a mailer of a mixed-weight presort mailing would confirm that the residual pieces from that mailing were not purely two-ounce items without sorting the residual by weight.
- b. Please confirm that if the residual pieces from a mixed-weight presort mailing consisting of one one-ounce piece and numerous two-ounce pieces, the mailer would qualify for the 48-cent residual rate.
- c. Please confirm that as of January 27, 2013, a mailer will have two options for mixed-weight residual pieces from a First-Class presort letter mailing: (1) separate the one-ounce from the two-ounce residual pieces and pay the applicable Single-Piece First-Class Mail rates, and (2) pay the 48-cent residual rate for all residual pieces weighing up to two ounces. If not, please explain.

RESPONSE:

- (a) The software used to prepare Presort mailings identifies the residual pieces by weight.
- (b) Confirmed. However, it is expected that residual pieces will be split between 1-ounce and 2-ounce pieces in proportion to the ratio of 1 and 2 ounce pieces in the Presort mailing. Having only one 1-ounce residual is not expected.
- (c) Confirmed.

4. If, question 4 [sic] is confirmed, please confirm that mailers with residuals containing a proportion of one-ounce to two-ounce pieces that exceeds the average have an incentive to continue to separate their residual pieces by weight and enter them as Single-Piece First-Class Mail.

RESPONSE:

Confirmed, assuming that the question intends to refer to question 3(c). But this incentive is offset by the mailer's costs of separating the residual pieces by weight. Those costs were the reason why some mailers asked to have a uniform price for one-ounce and two-ounce pieces.